

EXHIBIT 66

CONFIDENTIAL



Transcript of **Gene Steinberg**

Monday, May 9, 2022

*National Coalition on Black Civic Participation, et al.
v. Jacob Wohl, et al.*

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Reference Number: 115545

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF NEW YORK

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4 NATIONAL COALITION ON BLACK CIVIC PARTICIPATION,
5 MARY WINTER, GENE STEINBERG, NANCY HART, SARAH
6 WOLFF, KAREN SLAVEN, KATE KENNEDY, EDA DANIEL and
7 ANDREA SFERES,

8

9 Plaintiffs, Civil Action No.
10 1:20-cv-08668-VM-OTW
11 -and-

12 People of the STATE OF NEW YORK, by its Attorney
13 General, LETITIA JAMES, ATTORNEY GENERAL OF THE
14 STATE OF NEW YORK

15 -vs-

16 JACOB WOHL, JACK BURKMAN, J.M. BURKMAN & ASSOCIATES,
17 LLC, PROJECT 1599, MESSAGE COMMUNICATIONS, INC.,
18 ROBERT MAHANIAN and JOHN and JANE DOES 1-10

19 Defendants.

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21

22 Deposition of GENE STEINBERG, Plaintiff,
23 herein, taken by Defendant, pursuant to Notice via
24 Zoom, on Monday, May 9, 2022, at 10:00 a.m., before
25 Deirdre Smith, a stenographer and notary public
within and for the State of New York.

1 A P P E A R A N C E S

2

3 ORRICK HERRINGTON & SUTCLIFFE, LLP

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6 Appearng on behalf of the Plaintiff

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10 BY: BRITTANY ROEHR, ESQ.

11 FRANKLIN MONSOUR, ESQ.

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15 GERSTMAN SCHWARTZ LLP

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21 BY: RANDY KLEINMAN, ESQ.

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1 A P P E A R A N C E S (continued)

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3 LAWYERS COMMITTEE FOR CIVIL RIGHTS UNDER LAW

4 Appearing on behalf of Plaintiff

5 1500 K Street NW

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7 Washington, DC 20005

8 BY: MARC EPSTEIN, ESQ.

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12 STATE OF NEW YORK OFFICE OF THE ATTORNEY GENERAL

13 Appearing on behalf of Plaintiff

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15 Floor 18, New York, NY 10005-1495

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17 BY: COLLEEN FERITY, ESQ.

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1 MS. ROEHRIS: Objection.

2 A. Can you explain? I'm not sure I
3 understand the question.

4 Q. Sure. Well, let's do it like this, prior
5 to your involvement in this lawsuit did you have a
6 conversation with any of the other plaintiffs in
7 this lawsuit?

8 A. My then partner, Mary Winter, yes.

9 Q. What exactly did you discuss with Ms.
10 Winter?

11 MS. ROEHRIS: Objection.

12 A. So, after I received the robocall the
13 number one thing we discussed was whether to vote in
14 the presidential election in-person verses vote by
15 mail. Because we had voted by mail in the primary
16 and our plan was to vote by mail because of Covid,
17 by mail as well. So that was a discussion that we
18 discussed.

19 Q. Did you have any other conversations?

20 A. We lived together. I'm sure we did.

21 Q. Yeah, that was a bad question.

22 Specifically, with regard to the August 26, 2020
23 robocall did you have any other discussions about
24 that call?

25 MS. ROEHRIS: Objection.

1 as a result of the trauma you experienced stemming
2 from your criminal conviction?

3 MS. ROEHRIS: Objection.

4 A. I would say I've seen therapist as a
5 result.

6 Q. How long have you been seeing this
7 therapist for?

8 A. This specific one, six years.

9 Q. And how long have you been seeing a
10 therapist?

11 MS. ROEHRIS: Objection.

12 A. I don't know the answer to that.

13 Q. More than ten years?

14 A. Don't know the answer to that.

15 Q. Approximately, more than ten years?

16 A. I don't recall. I would be guessing.

17 Q. Have you ever been diagnosed with any
18 mental health condition or disorder?

19 MS. ROEHRIS: Objection.

20 A. No.

21 Q. Is it fair to say that you were seeing a
22 therapist long before you received the August 26,
23 2020 robocall?

24 A. That's fair.

25 Q. What inspired you to create Freidom?

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2 C E R T I F I C A T I O N

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5 THIS IS TO CERTIFY, THAT I, DEIRDRE M. SMITH,
6 on Monday, May 9th of 2022, reported the proceedings
7 contained in the foregoing 71 pages at the time and
8 place as set forth in the heading in the foregoing
9 matter. That the transcript is a true and accurate
10 transcription of my stenographic notes, using
11 Computer Aided Transcription, to the best of my
12 ability.

13 IN WITNESS WHEREOF, I have hereunto set my hand
14 this 23rd day of May, 2022.

15 
16

17 Deirdre M. Smith
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